

REMARKS

Applicant traverses all outstanding rejections and requests reconsideration and withdrawal of the Examiner's rejections in light of the arguments below. Claims 1-25 are pending in this application.

Rejection under 35 U.S.C. § 103(a)

Claims 1, 4-5, and 7-25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hong* (U.S. Patent No. 5,943,064) in view of *Nally et al.* (U.S. Patent No. 5,598,525, hereinafter *Nally*). To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the second criteria, Applicant asserts that the Examiner's rejection of these claims does not satisfy the first and third criteria.

Improper Motivation

The Examiner has not fully addressed the Applicant's traversal of the Examiner's 103(a) rejection of claims 1, 4-5, and 7-20. Applicant asserted in the March 10, 2004 Response that *Hong* appears to teach away from the modification cited by the Examiner. The Examiner has not appeared to consider the substance of this argument as required under M.P.E.P. § 707.07(f). Applicant respectfully requests that the Examiner consider this aspect of the Applicant's argument and respond appropriately.

Applicant re-asserts all arguments made in the March 10, 2004 Response. Neither the *Hong* nor the *Nally* reference suggest the cited combination, nor would such a combination be obvious to one of ordinary skill in the art. The Examiner has asserted that combining the teachings of *Hong* with those of *Nally* would be obvious because "it provides for an efficient processing of graphics object data." Applicant asserts that there was no reasonable expectation of success in achieving the motivation cited by the Examiner, as it could not be predicted without experimentation whether such a combination would provide for efficient

processing of graphics object data. Such an expectation is required for claim rejections under 35 U.S.C. § 103(a) that rely on a combination or modification of one or more references. *See* M.P.E.P. § 2143.02. Therefore, the Examiner's rejection of claims 1, 4-5, and 7-20 is based on improper motivation to combine.

Not All Limitations

The combination of the teachings of *Hong* and *Nally* does not contain all of the limitations of the claimed subject matter. Regarding claim 1, the June 8, 2004 Office Action admits in Paragraph 5a that *Hong* does not disclose a selectively configurable interconnection matrix defining an image path for providing selected outputs from one or more of said states of one of said pipelines to selected inputs of one or more of said stages of said pipelines. *Nally* does not cure this deficiency. Applicant asserted in the March 10, 2004 Response that *Nally* does not disclose a selectively configurable interconnection matrix. The Examiner has not demonstrated that *Nally* discloses such a matrix in the current Office Action. Therefore, Claim 1 is not obvious over the cited references.

Claim 10 is directed to a method of processing an image comprising a step of selectively configuring a pipeline interconnection matrix to establish an image path through one or more stages of a graphics pipeline and one or more stages of a bit map image pipeline. *Nally* does not disclose the step of selectively configuring a pipeline interconnection matrix, nor does the *Hong* reference contain such a disclosure. Therefore, Claim 10 is not obvious over the cited references.

Claim 19 is directed to an image processor comprising a switch for selectively connecting an output from any one of processors to an input of any other one of processors. The Office Action states that claim 19 has been rejected on the same grounds as claim 4, in that *Hong* discloses an output stage connected to an output from each of said pipelines. However, this does meet the requirements for support of a 35 U.S.C. § 103(a) rejection, as neither *Hong* nor *Nally* disclose a switch for selectively connecting as described in the claimed subject matter. Because the cited references do not disclose all of the limitations of claim 19, this claim is also not obvious over the cited references.

Applicant traverses the Examiner's assertion in the June 8, 2004 Office Action that claim 21 is similar in scope to claim 1. Claim 21 is directed to a processor comprising a plurality of interconnects that connects each stage of a first plurality of stages with at least one other stage in a first pipeline and with a third plurality of stages in a second pipeline, and connects each stage of second plurality of stages with at least one other stage in the second pipeline and with a fourth plurality of stages in the first pipeline. The June 8, 2004 Office Action did not demonstrate that either the *Hong* or the *Nally* reference disclosed this limitation of claim 21. Therefore, since the cited references do not contain all of the limitations of claim 21, this claim is not obvious over the cited references.

Claims 4-5, 7-9, 11-18, 20, and 22-25 depend directly from claims 1, 10, 19, and 21 and therefore contain all of the limitations of the base claim. Each of claims 4-5, 7-9, 11-18, 20, and 22-25 sets forth features and limitations not recited by the combination of *Hong* and *Nally*.

For the above reasons, Applicant respectfully asserts that claims 4-5, 7-9, 11-18, 20, and 22-25 are patentable over the 35 U.S.C. § 103(a) rejection of record. Applicant requests that the Examiner withdraw the rejection of claims 1, 4-5, and 7-25 and continue with examination.

Rejection under 35 U.S.C. § 103(a)

Claims 2, 3, and 6 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hong* in view of *Nally* and further in view of *Sturgess* (U.S. Patent No. 5,861,893).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the second criteria, Applicant asserts that the Examiner's rejection of these claims does not satisfy the first and third criteria.

Improper Motivation

As stated above, the motivation for combining the *Hong* teachings with those of *Nally* is flawed. The motivational statements provided to add *Sturgess* to this combination do not overcome the deficiencies of the motivation for combining *Hong* and *Nally*. Therefore, the rejection of claims 2-3 and 6 should be withdrawn.

Not All Limitations

Claims 2-3 and 6 depend directly from claim 1. As discussed above, claim 1 is not obvious over *Hong* in view of *Nally*, as the combination does not disclose all of the limitations of claim 1. Because claims 2-3 and 6 depend directly from claim 1, they inherit all of the limitations of that claim. Each of claims 2-3 and 6 sets forth features and limitations not recited by the combination of *Hong*, *Nally*, and *Sturgess*. Therefore, the Applicant respectfully asserts that for the above reasons claims 2-3 and 6 are patentable over the 35 U.S.C. § 103(a) rejection of record. Applicant requests that the Examiner withdraw the rejection of claims 2-3 and 6 continue with examination.

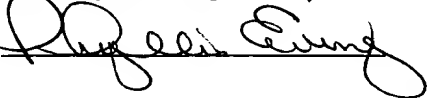
In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10004829-1 from which the undersigned is authorized to draw.

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Date of Deposit: 08-06-2004

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